

465 Chestnut Creek Lane  
Willis, VA 24380  
March 24, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

6368 '99 MAR 29 A9:52

RE: Docket #98N-1038, "Irradiation in the Production, Processing and Handling of Food"

Dear Sir or Madam:

It is my understanding that the FDA is considering removing the labeling requirements for food that has been irradiated. As a citizen and consumer, I strongly urge that clear labels continue to be required for such food. In the same way that milk is labeled as "pasteurized and homogenized," any food that is processed should be labeled with the exact type of processing that is done to it so that consumers may make educated choices. The burden should be on the processors, not the FDA using taxpayer dollars, to convince consumers that this process is safe and in our best interests.

Because of the many food-borne illness scares, I believe large numbers of people will choose sterile food products despite documented changes in the food's chemical makeup, taste and texture caused by irradiation. Canning and freezing, for example, cause significant changes in food, yet people buy canned and frozen products because they are convenient. ***Of course, it is clear that the products have been processed in either case.*** Those who choose to eat fresh produce may easily make that choice. However, it is not so clear which food has been irradiated and which is not; therefore, the label should be maintained so that consumers may make their own choices at the point of purchase. Not all consumers are as convinced as to the safety of irradiation as the FDA is.

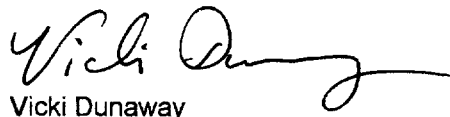
It seems to me that this is similar to the argument for pasteurization of milk. When people began mixing milk from different farms and processing it in large plants, it became clear that not all farmers maintained high standards. I note from an old *Minnesota Farmers' Institute Annual* (#20, 1907) in that it was once recommended that there be three grades of commercial milk:

- Class 1. Certified milk, which must have a low bacterial count less than 10,000 per cc.
- Class 2. Inspected milk, which must have a bacterial count less than 100,000 per cc.
- Class 3. Pasteurized milk, which is all milk from dairies not able to comply with the first two classes. In other words, the dirty milk was to be pasteurized.

Even though almost all milk must now be pasteurized, it must also be labeled as such. I see no reason to exempt the irradiation industry from indicating that food has been processed by a different treatment, which even they call "cold pasteurization." If they are going to call this pasteurization, then some clear means to identify the **type** of pasteurization (UV, heat, irradiation), should be part of the label. Symbols might be appropriate.

Our current food system has become too large, with food traveling great distances and being handled by many people, with many possible points of contamination. ***That is the problem.*** To address the real issue would be preferable to applying more and more Band-Aids such as irradiation.

Yours truly,

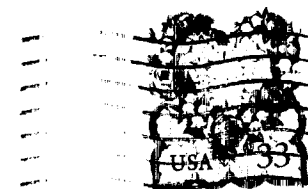
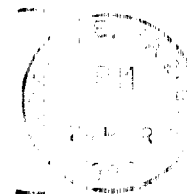
  
Vicki Dunaway

cc: Hon. Rick Boucher, Rep. (VA)

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